

ATTACHMENT 1

FILED/REC'D

2022 JUN 21 A 10:24

COMPLAINT FORM

(for filers who are prisoners without lawyers)

CLERK OF COURT  
U.S. DISTRICT COURT  
WD OF WI

IN THE UNITED STATES DISTRICT COURT  
FOR THE Western DISTRICT OF Wisconsin

(Full name of plaintiff(s))

DAVID ANTHONY PEARSON, JR

vs

(Full name of defendant(s))

Captain, JIM Verse  
SEGEANT, Greg Hoesly  
OF Lacross County Jail

Case Number:

22 CV 343 JDP

(to be supplied by clerk of court)

A. PARTIES

1. Plaintiff is a citizen of Wisconsin, and is located at  
(State)

333 Vine Street, Lacrosse, WI 54601  
(Address of prison or jail)

(If more than one plaintiff is filing, use another piece of paper).

2. Defendant Greg Hoesley, James Verse of Lacrosse County Jail  
(Name)

is (if a person or private corporation) a citizen of Wisconsin  
(State, if known)

and (if a person) resides at \_\_\_\_\_  
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for Lacrosse County Sheriff/County Jail / 333 Vine St Lacrosse, WI 54601  
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

Since I have been detain at Lacrosse County Jail I  
I have been told that I can't receive mail and that I  
gotta use this kiosk machine in which has a phone plus  
A EMessaging, law library Now on the above date 12-18-21  
which was My fathers funeral I was deny any kind of  
communication with my family plus I have been told  
on multiple occasion that using the kiosk machine  
was a privilege by Captain. JIM. Verse, Sergeant  
Greg Hoesley both was inform about my father funeral

Before hand so on the day of the funeral I ask Jail Staff may I use the kiosk machine to talk to my family And see videos/Pictures of my dad that was sent to me On 12-17-21 a day before the funeral and Jail Staff Stated Captain or sergeant didn't inform you since you Didn't move all your privileges has been restrained so I Newer got to talk to my family on the day of my fathers Funeral and a couple days went past when Sergeant Hoesley came and stated that I am not entitle to using The kiosk machine due to the fact it's a privilege so I ASK how is it a privilege if that's how I communicate With my family and friend plus it also has Law Library on the same machine that's when Sergeant hoesley Stated when you learn to follow are program that's When you can have your privileges back, I have Been asking legal help and this jail don't have any-Body assist in researching cases, or drafting motions And where not allow to get physical mail from family Members and plus I have been place in this restraint chair which is a form of torture due to

The Restraint chair causes pain plus left Multiple Bruising on my ankles, wrist, under armpits/Shoulders And plus the County Jail has this padded cell in which has a sewer drain for a toilet And has no Access to water or sun light I have been place in that chair and rolled in that padded cell and Sat for hours with having access to a toilet so I was force to use the bathroom on myself due to being deny perviously by jailer/staff, being in that chair and cell is a feeling of being treat like a Slave or Dog I have been threaten to be taser guns And taser gloves in which is a form of being treated As cattle I have been ran through the rings being in lacrosse county jail and now I'm in a cell 24 hours A day in which is driving me to hear and see thing This is torture in which has cause me to have Extrem anxiety and alot more mental distress.



C. JURISDICTION

☐ I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

☒ I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$\_\_\_\_\_.

D. RELIEF WANTED

Describe what you want the court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or stop doing something.

I would like for the county to room that tortuous  
Restraint chair with all dangerous weapons including  
taser guns and other dangerous equipment that could  
cause death, and I would like for that padded  
Room to have access to sunlight, water and a real  
Toilet so people could feel normal and not like  
Animals or a SLAVE. And I would like for  
The Lacrosse County Jail to compensate  
Five hundred thousand dollars. THANK you.

E. JURY DEMAND

☐ Jury Demand - I want a jury to hear my case  
OR

☒ Court Trial - I want a judge to hear my case

Dated this 06 day of 16 2022.

Respectfully Submitted,

Dan A Pearson JR

Signature of Plaintiff

2018-0704

Plaintiff's Prisoner ID Number

333 Vine street

Lacrosse, WI 54601

(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper).

**REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FILING FEE**



I **DO** request that I be allowed to file this complaint without paying the filing fee. I have completed a request to proceed in the district court without prepaying the fee and attached it to the complaint.



I **DO NOT** request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.